

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

In Re: Katrina Deshawn Camp
Debtor

Case No.: 15-70651-SCS
Chapter 13

MOTION FOR RETURN OF UNCLAIMED FUNDS

COMES NOW, the Debtor, Katrina Deshawn-Camp by counsel, and move this Court for entry of an Order Authorizing the return of unclaimed funds pursuant to FRBP 9013 and section 3011 (3) of the Local Bankruptcy Rules for the Eastern District of Virginia; and in support thereof states as follows:

1. That the Debtor filed a Chapter 13 Bankruptcy on March 2, 2015.
2. That Michael P. Cotter was appointed as the Debtor's Chapter 13 Trustee.
3. That the Debtor states that she does consent to the entry of final orders or judgment by the Bankruptcy.
4. The Debtor did have a Chapter 13 Plan confirmed during the pendency of her case.
5. The Debtor's Chapter 13 case was dismissed by order entered on October 30, 2017.
6. The Chapter 13 Trustee filed a report of deposit of unclaimed funds (Docket #40) on August 17, 2018.
7. The Clerk of the Bankruptcy Court issued a receipt of deposit of unclaimed funds in the amount of \$1,030.44 (Docket #41) (Receipt #166850) on August 20, 2018.

Neil K. Winchester
Harbour Law, PLC
500 East Plume Street, Suite 801
Norfolk, Virginia
757-622-1621
757-623-3250 (fax)
Counsel for Debtor

8. The source of the funds was the Debtor and payments she made to the Chapter 13 Trustee.
9. The Debtor's name is Katrina Deshawn Camp.
10. The Debtor's address is 909 Grayson Street, Norfolk, Virginia 23523.
11. The Debtor believes that there are not any other parties entitled to the funds.

WHEREFORE, the Debtor respectfully requests entry of an Order authorizing the return of unclaimed funds pursuant to FRBP 9013 and section 3011 (3) of the Local Bankruptcy Rules for the Eastern District of Virginia in the amount of \$1,030.44.

KATRINA DESHAWN CAMP

By: /s/ Neil K. Winchester
Neil K. Winchester

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NOTICE OF MOTION FOR RETURN OF UNCLAIMED FUNDS

Katrina DeShawn Camp, the Debtor, by Neil K. Winchester, Esquire, counsel has filed papers with the court; your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one).

Under Local Bankruptcy Rule 9013-1, unless a written response to this motion and supporting memorandum are filed with the Clerk of Court and served on the moving party within 21 days of the services of this notice and motion, objecting to the relief requested, the Court may deem any opposition waived, treat the motion as conceded, and issue an order granting the requested relief without further notice or hearing.

If you do not want the Court to grant this request, or if you want the Court to consider your views on the Motion, then you or your attorney must file with the Court your response and objection and request a hearing to the address listed below:

U.S. Bankruptcy Court
Norfolk Division
600 Granby Street
Norfolk, Virginia 23510

Neil K. Winchester
Harbour Law, PLC
500 East Plume Street, Suite 801
Norfolk, Virginia
757-622-1621
757-623-3250 (fax)
Counsel for Debtor

If you mail your request to the court for filing you must also mail a copy to:

Neil K. Winchester (VSB No. 26364)
Harbour Law, PLC
500 East Plume Street, Suite 801
Norfolk, Virginia 23510

/s/ Neil K. Winchester
Neil K. Winchester

Dated: June 14, 2019

CERTIFICATE OF SERVICE

This is to certify that a true copy of the foregoing Motion and Notice of Motion for Return of Unclaimed Funds was mailed/ and or electronically forwarded this 14th day of June, 2019, to Michael P. Cotter, Chapter 13 Trustee, to the Debtor, the Office of the United States Trustee, and to the United States Attorney for the Eastern District of Virginia.

/s/ Neil K. Winchester
Neil K. Winchester